

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOHN DOE,

Plaintiff,

v.

BRANDEIS UNIVERSITY, *et. al.*,

Defendants.

Civil Action
No. 19-11049-LTS

JOINT SCHEDULING CONFERENCE STATEMENT

Pursuant to Local Rule 16.1. counsel for the defendant and plaintiff *pro se* have conferred and now submit this Joint Scheduling Conference Statement in anticipation of the scheduling conference set for September 16, 2019, at 9:00 a.m.

A. Proposed Pretrial Schedule

This case was filed on May 6, 2019, and the answer was filed on July 22, 2019.

Counsel for the defendant and plaintiff *pro se* accordingly propose the following pretrial schedule:

1. AMENDMENT OF PLEADINGS to be completed by **March 1, 2020.**
2. INITIAL DISCLOSURES required by Fed. R. Civ. P. 26(a)(1) to be completed by **October 1, 2019.**
3. FACT DISCOVERY including service of and responses to written discovery requests and all depositions, to be completed by **May 1, 2020.**
4. EXPERT DISCOVERY
 - a. Plaintiff's trial experts designated and information required by Fed. R. Civ. P. 26(a)(2) disclosed by **June 1, 2020.**
 - b. Defendant's trial experts designated and information required by Fed. R. Civ. P. 26(a)(2) disclosed by **July 1, 2020.**

c. Expert depositions concluded by **August 1, 2020.**

5. DISPOSITIVE MOTIONS

a. Dispositive motions filed by **July 15, 2020.**

b. Oppositions to dispositive motions filed by **August 15, 2020.**

6. CASE MANAGEMENT AND PRETRIAL CONFERENCES on dates to be

determined by the Court.

B. Certifications

The parties' certifications of compliance with Local Rule 16.1(D)(3) are attached.

Plaintiff *pro se*,

Counsel for the defendant,

/s/
John Doe
P.O. Box 541456
Waltham, MA 02454
(312) 971-1117

/s/
Scott A. Roberts (BBO No. 550732)
Arielle B. Kristan (BBO No. 677048)
Hirsch Roberts Weinstein, LLP
24 Federal Street, 12th Floor
Boston, MA 02108
(617) 348-4300

September 9, 2019

CERTIFICATE OF SERVICE

I, John Doe, hereby certify that on this 9th day of September, 2019, this document was filed electronically through the ECF system and thereby delivered by electronic means to all counsel of record.

/s/ **John Doe, *pro se***

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOHN DOE,

Plaintiff,

v.

BRANDEIS UNIVERSITY, *et. al.*,

Defendants.

Civil Action
No. 19-11049-LTS

PLAINTIFF'S CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3)

The undersigned affirm that they have conferred with a view to establishing a budget for the costs of conducting the full course and various alternative courses of the litigation and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Plaintiff *pro se*,

/s/

John Doe
P.O. Box 541456
Waltham, MA 02454
(312) 971-1117

September 9, 2019

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOHN DOE,

Plaintiff,

v.

BRANDEIS UNIVERSITY, *et. al.*,

Defendants.

Civil Action
No. 19-11049-LTS

DEFENDANTS' CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3)

On behalf of the defendants Brandeis University, *et al.*, the undersigned affirm that they have conferred with a view to establishing a budget for the costs of conducting the full course and various alternative courses of the litigation and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Counsel for the defendants,

Authorized representative of the defendants,

_____/s/
Scott A. Roberts (BBO No. 550732)
Arielle B. Kristan (BBO No. 677048)
Hirsch Roberts Weinstein, LLP
24 Federal Street, 12th Floor
Boston, MA 02108
(617) 348-4300

_____/s/
Steven S. Locke
Counsel
Brandeis University
415 South Street, Gryzmish Center 117
Waltham, MA 02453
(781) 736-3017

September 9, 2019